

Dr. D. Clark Gibbs, Regulatory Official
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A4-70
Richland, Washington 99352

Direct tel: (509) 376-9936
Direct fax: (509) 376-3661

CCN: 014189

Date:

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC27-96RL13308 – W375 – LIMITED CONSTRUCTION
AUTHORIZATION REQUEST RIVER PROTECTION PROJECT - WASTE
TREATMENT PLANT**

Reference: CCN 009099, Letter, A. J. Dobson, BNFL Inc., to D. C. Gibbs, DOE/RL, "Intent to Submit Limited Construction Authorization Request for the River Protection Project Waste Treatment Plant," dated December 20, 1999.

We are pleased to submit for your review and approval the Limited Construction Authorization Request (LCAR) for the River Protection Project - Waste Treatment Plant (Attachment 1). This request is for authorization to perform limited construction activities for which notification of intent to submit was provided in the reference letter per Contract Standard 4, Section c.2)(j).

In preparation for construction of the main facilities and buildings of the River Protection Project-Waste Treatment Plant (RRP-WTP, BNFL Inc. requests approval to prepare the site, complete major excavation, place mud mats, and begin construction of temporary and permanent facilities that would support initial construction activities. Detailed schedules showing activities within the scope of this LCAR is provided in attachment 2 (Schedule for Limited Construction Authority (LCA) Activities).

Scheduled activities include the essential initial steps to mobilize on-site and to begin construction per the project baseline schedule. The critical path to initiation of vitrification services passes through commissioning of pretreatment services. Completion of the Pretreatment facility on this path requires initial excavation work as described in Section 1.3 of the LCAR. In parallel with Pretreatment facility excavation, similar work proceeds for the other major facilities. The remaining activities to be authorized under the (LCA) include numerous services and site preparation tasks to support excavation and subsequent work. The benefit of authorizing this work in advance of the Construction Authorization is to support start of vitrification in 2007.

Over the current period preceding site mobilization for the LCA scope, the WTP team will issue numerous documents for construction and procurement, including technical specifications,

procurement specifications, design drawings, construction procedures, training modules, etc. These must reflect an appropriate set of criteria and requirements including considerations related to safety and environmental protection. The LCAR and the Quality Assurance Plan revision, which will be separately submitted, describe criteria and requirements that are essential inputs. Late rework of these documents and the large number of planned actions that follow from them could impact site mobilization. Therefore, agreement with the LCAR criteria and requirements is sought in a time frame that minimizes the potential impact of any changes resulting from the review.

The construction procedures described in Section 3.5.1 of the LCAR will be available for inspection by early October to support LCA activities. Referenced Authorization Basis Documents, including Quality Assurance Program (QAP) and the Radiation Protection Program for Design and Construction (RPP), will be submitted separately.

Not discussed in this submittal is the occurrence reporting program for reporting of design and material defects and nonconformances affecting radiological nuclear and process safety. This program is under development and will be provided separately after planned meetings with the RU have occurred. Discussion of the occurrence reporting for radiological contamination is contained in LCAR Section 4.1 and for industrial safety in LCAR Section 4.2

Attachment 3 provides a correlation of criteria from RL/REG-99-017 Rev.1 Review Guidance to applicable sections of the LCAR.

Also included to support your review is the Geotechnical Report (Attachment 4) referenced in the LCAR.

A disk (CD-ROM) in Microsoft Word format containing this letter and the attachments is included for the Regulatory Unit's use (Attachment 5).

If you have any question, please contact Mr. Dennis Klein at (509) 371-4867 or Ms. Carole Younger at (509) 371-4857

Yours sincerely,

Steven R. Morgan
Commercial Manager

RI/gls

Attachments:

- 1) Limited Construction Authorization Request RPT-W375-CN00002, Rev. 0
- 2) Schedules for LCAR Activities
- 3) RL/REG-99-017 – LCAR Cross Reference
- 4) Geotechnical Investigation Report
- 5) Disk with Letter and Attachments

cc: <u>Name (ALPHABETIZE)</u>	<u>Organization</u>	<u>MSIN</u>
Barr, R. w/a	DOE/RL	A4-70
Barrett, M.K. w/o	DOE/ORP	H6-60
Brown, N. w/a	DOE/ORP	H6-60
Clements, W. LCAR only	BNI	A204
Davies, B. LCAR only	BNFL Inc.	A213
Dobson, A LCAR only	BNFL Inc.	A117
Klein, D. LCAR only	BNI	ETC-1/P125
Landry, W. w/o	BNFL Inc.	Fairfax
Lucas, L LCAR only	BNFL Inc.	ETC-2/273
Lynch, S. LCAR only	BNI	B208
Molnar, E. w/o	BNI	A216
Morgan, S.R.w/o	BNFL Inc.	A116
Nakao-, R. LCAR only	BNI	ETC-1/R111
PDC w/a	BNFL Inc.	K110
Smyser, L. w/a	PNNL	H6-61
Strawbridge, P. LCAR only	BNFL Inc.	A110
Williams, N. LCAR only	BNI	A215
Younger, C. LCAR only	BNFL Inc.	ETC-1/P123

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